

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
American Creosote DeRidder - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #1  
Initial - Removal Assessment  
American Creosote DeRidder  
A6KM  
DeRidder, LA  
Latitude: 30.8317038 Longitude: -93.2768610

**To:** Jeff Dauzat, LDEQ  
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Craig Carroll, EPA Region 6

**From:** Adam Adams, OSC  
**Date:** 3/27/2020  
**Reporting Period:** 10/2019 - 3/27/2020

## 1. Introduction

### 1.1 Background

Site Number:	A6KM	Contract Number:
D.O. Number:		Action Memo Date:
Response Authority:	CERCLA	Response Type:
Response Lead:	EPA	Incident Category:
NPL Status:	NPL	Operable Unit:
Mobilization Date:	10/9/2019	Start Date:
Demob Date:		Completion Date:
CERCLIS ID:	LAN000604293	RCRIS ID:
ERNS No.:		State Notification:
FPN#:		Reimbursable Account #:

#### 1.1.1 Incident Category

CERCLA incident category: Inactive Production Facility – Creosote Wood Treater  
This is an EPA lead Removal Assessment effort.

#### 1.1.2 Site Description

American Creosote Deridder (Site) consists of a 55-acre tract of land owned by Central Manufacturing Co. (CMC) and the location of an inactive facility that produced creosote-treated wood. The Site has been inactive for 60+ years and currently covered by a mixture of heavy timber and extensive overgrowth.

The Shreveport Creosoting Company operated the facility from early 1920's until approximately 1957, used creosote oil and oil tar in their treatment process, and abandoned the facility after 25+ years of operations. The abandoned facility is located in the central west portion of the Site and contains remnants of the former facility along with process related waste. Site drainage from the abandoned facility primarily flows overland southwest, along western property boundary, into an unnamed drainage ditch/stream, which is a segment of contiguous wetland, then flows west through a culvert and under an old Burlington Northern Santa Fe (BNSF) Railway spur where it continues to flow southwest into a fresh water pond.

#### 1.1.2.1 Location

The Site is located off of Post Plant Road, south of the corporate limits of the City of DeRidder, Beauregard Parish, LA; at 30.831693°, -93.276863°; in Section 3, Township 3 South, and Range 9 West; and within a mixed use area, residential and industrial. The Site is bounded in the north by a rural roadway, in the east by heavy brush, in the south by undeveloped land, and in the west by the old BNSF spur. The Site is accessible from the north at the intersection of Post Plant Rd. and the old BNSF spur and from the south at the intersection of Crosby Rd. and the old BNSF spur. An estimated 1,491 people live within a 1-mile radius of the Site, and the nearest residence is located approximately 0.3 miles to the east then residential communities approximately 0.5 miles to the east and north.

#### 1.1.2.2 Description of Threat

The Site was finalized on the NPL in January 2018, and scored based on 5 Source Areas (SAs) and an observed release of hazardous substances to the surface water pathway. EPA identified numerous hazardous substances, primarily PAHs, within and around the 5 SAs, drainage pathway, and groundwater;

TPH and metals were also identified. The 5 SAs include: 1) Concrete Structure of a Former Retort House, 2) Concrete Oil/Water Separator, 3) Unlined Wastewater Pit (AKA pond), 4) Aggregated Areas of Contaminated Soil, and 5) Stockpile of Creosote Solids.

In August 2018, EPA Remedial began a Remedial Investigation/Feasibility Study (RI/FS). In 2019, EPA Remedial Program requested assistance from the EPA Removal Program to address source material at the Site to prevent further offsite migration and reduce the threat to public health and environment while long-term remedial actions were determined. Although the 5 SAs on- and off-site surface water pathway were initially identified as potential areas for removal; EPA Remedial identified 3 SAs (SAs 1, 2, and 3) as the primary concern and the focus of removal action. These SAs contain creosote solids and impacted soil, sediment, and/or surface/storm water containing PAHs and/or metal concentrations above RMLs. The highest concentrations were 4,314 ppm of benzo(a)pyrene (BAP) Equivalent and 25.3 ppm of thallium within SA 3 sediment as compared to the industrial setting RMLs of 210 ppm and 12 ppm, respectively.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

In November 2019, EPA and the EPA Superfund Technical Assistance Response Team (START) contractor conducted a preliminary removal assessment/removal site inspection of the Site. The Site was found to contain approximately 2,254 cubic yards of solid waste and approximately 204,974 gallons of liquid waste within and around SAs 1, 2, and 3, as applicable; identified BAP and naphthalene as main safety concerns; determined dioxins/furans were not present; selected approximate location of the 2,400-foot access pathway to SAs; and estimated 3 acres of vegetation clearing for pathway and work zones (estimates only).

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

In October 2019, EPA Removal began a Removal Assessment of the Site that consisted of a preliminary removal assessment and a removal site inspection which included on- and off-site visits/assessment, sampling, and review of previous investigations. The assessment was conducted in preparation of the removal by determining the actions and associated costs required to complete, as well as, to ensure they contributed to the performance of the long-term remedial action. Through the assessment, EPA determined: the location, volume estimates, and type of waste to be removed; actions needed to access and remove waste; potential waste treatment and/or disposal options; and health and safety concerns. As of November 2019, EPA made these determination as noted in Section 1.1.3.

On March 4<sup>th</sup> 2020, EPA began the removal action utilizing information gathered during the Removal Assessment, which continued until Marth 27th 2020 when activities were temporally suspended as part of the COVID-19 pandemic response.

#### **2.1.2 Response Actions to Date**

On October 9<sup>th</sup> 2019, EPA along with START and ERRS conducted an initial site visit that included assessment of current site conditions and waste sampling. The Site was found, as previously noted, overgrown with a mixture of timber and understory vegetation that requires extensive vegetation clearing to access waste. A total of 5 samples were collected for TAL metals, TCL SVOCs, and dioxin/furans from SAs 3, 4, and 5; 1 sediment sample from SA 3, 3 surface soil samples from SA4, and 1 surface soil sample from SA5. The sample results were compared to Industrial Soil RMLs of HQ1 and using BaP equivalent for PAHs. All sample results were below RMLs except for SA3 sediment sample that exceeded thallium RML of 12 ppm at 25.3 ppm and BAP RML of 210 ppm at 4,313.6 ppm. Also, all samples were below the TCDD RML using 2005 WHO TEQs that suggested PCP and dioxin/furan were not COCs. Following the site visit, the sample results were illustrated on figures along with results from previous investigation that were utilized to develop waste volume estimates; in addition, the results were utilized to begin selection and procurement of treatment and/or disposal options. As a result, EPA estimated 8,251 cubic yards of waste to be removed from SAs 1 – 5; 4.5 acres of vegetation to be cleared to access waste from the north; and waste would likely need to be incinerated (considering it as a Listed Hazardous Waste) and the mercury concentration (17.6 ppm) in SA3 sediment could present an issue during treatment.

On November 13<sup>th</sup> and 14<sup>th</sup> 2019, EPA, START, and ERRS returned to the Site to conduct a limited assessment of the off-site surface water pathway to delineate the horizontal and vertical extent of weather creosote to be removed. This assessment was at the RPM's request based on observations of a significant amount of weathered creosote found within the pathway by EPA Remedial contractors. The assessment was conducted down-gradient/stream of Probable Point of Entry (PPE) defined in and referred to as Segment 2: Level II Contamination within the *American Creosote DeRidder HRS Document Record* dated July 2017. The assessment consisted of walking the pathway and by probing the ground on both sides of the stream to determine the horizontal and vertical extent of the contamination. Weathered creosote was found in a hardened vitrified form at the surface and in a less hardened, weathered form (crumbly) under soil overburden that ranged from a few inches to up to 3 feet (near wetland area) with an average of 10-12 inches of soil overburden. Considering the ~60 years of inactivity as well as the 30 years of the timber treatment operations, the current path of the stream, as observed, was likely altered over time by the creosote deposits. At locations at depth and near wetland area, a strong naphthalene (moth ball like) odor was observed during probing. As a result, EPA estimated 1.2 acres needed to be removed at varying depths. At this time, EPA met with property owner (Ingevity) to acquire consent for removal action; EPA Remedial already acquired consent to access property. Also, a southern access pathway for the Site was selected due to logistic and access issues entering Site from the north.

Although EPA Remedial initially requested removal of all 5 SAs, as well as potentially the off-site portion; the RPM identified 3 SAs (SAs 1, 2, and 3) as the primary concern. Based on the current scope of work, OSC Adams drafted an Action Memorandum primarily for the removal of waste from the 3 SAs, which was approved and signed on December 18<sup>th</sup> 2019.

On December 11<sup>th</sup> 2019, EPA returned to the Site to acquire property access from owner (JDOT) of the

property south of the Site. The owner is currently leasing the property to a company (Troy Construction) who was met with and agreed to allow EPA to enter their property to access the Site from the south.

On January 31 2020, EPA returned to the Site to collect a representative sample of SA 3 water for waste characterization. A total of 2 composite samples were collected and analyzed for TAL metals, TCL VOCs, and TCL SVOCs. The results indicated the water had low concentrations of COCs with the highest exceeding waste water UTS for anthracene of 0.059 ppm at 0.0613 ppm.

On March 26<sup>th</sup> 2020 from the Site property boundary, EPA assessed the potential impact by site-related contamination of a private pond located off-site, on the southeast corner of the Site. The assessment as conducted at the RPM's request based on the detection of PAHs within a sediment sample collected by EPA Remedial Contractors. No observed pathway or site-related contamination (weathered creosote) from the former facility was found; however, creosote-treated timber, used as fence posts, and potential piece (3" x 3") of weathered creosote in a mound of soil along edge of pond were observed.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The Potentially Responsible Party (PRP) is Central Manufacturing Company (CMC).

#### **2.1.4 Progress Metrics**

Any disposal metrics would be included in the Removal Action POLREPs rather than the Removal Assessment POLREPs.



### **2.2 Planning Section**

#### **2.2.1 Anticipated Activities**

Conduct Removal Action and continue assessment efforts, as needed.

##### **2.2.1.1 Planned Response Activities**

Following the temporary stand-down due to COVID-19, EPA plans to resume Removal Action and further assess potential impact to the adjacent southeast property, if needed.

##### **2.2.1.2 Next Steps**

Coordinate return with EPA contractors, state and local government, and continue communications with the EPA RPM, property owner, and community.

##### **2.2.2 Issues**

Consistent with CDC and national guidance regarding the COVID19 pandemic, EPA temporarily stood down the Removal Action and Removal Assessment activities on March 27, 2020 until further notice.

### **2.3 Logistics Section**

No information available at this time.

### **2.4 Finance Section**

No financials are provided in this POLREP, at this time.

### **2.5 Other Command Staff**

This Removal Assesment and Removal Action are being conducted by the EPA Removal Program with support from the Remedial Program.

## **3. Participating Entities**

EPA is coordinating this removal assessment with the EPA Remedial Program, LDEQ, Louisiana Department of Health and Hospitals (LDHH), and City of DeRidder.

## **4. Personnel On Site**

EPA and EPA contractors, as needed.

EPA Remedial Team information is not included in this POLREP, but are on-site at the discretion of the EPA RPM.

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

Additional information may be obtained at [response.epa.gov/AC-DeRidder](http://response.epa.gov/AC-DeRidder).

### **6.2 Reporting Schedule**

This is the Initial POLREP for this Removal Assessment. Additional POLREPs may be provided at the following frequency:

Progress POLREP - As progress continues over an extended period of time, a Progress POLREP may be submitted.

Special POLREP - In the event a significant situation occurs during the response, a Special POLREP may be

submitted.

Final POLREP - Upon completion of this response, a Final POLREP shall be submitted.

POLREPs for Removal Assessment efforts will be submitted separately from the Removal Action POLREPs.

#### **7. Situational Reference Materials**

No information available at this time.